

**BEFORE THE JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

**IN RE THOMAS & FRIENDS™
WOODEN RAILWAY TOYS
LITIGATION**

MDL DOCKET NO.: _____

REQUEST FOR ORAL ARGUMENT

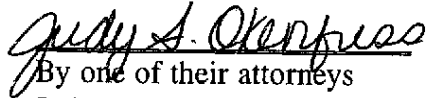
Pursuant to 28 U.S.C. §1407 and Rule 16.1 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation ("JPML"), Defendants RC2 Corporation and Learning Curve Brands, Inc. (collectively referred to hereafter as "RC2") respectfully submit this request for oral argument in conjunction with RC2 Corporation's and Learning Curve Brands, Inc.'s Motion for Transfer of Actions to the Northern District of Illinois for Consolidated Pre-Trial Proceedings Pursuant to 28 U.S.C. §1407 ("the Motion for Transfer").

The factual issues and procedural posture of the Thomas & Friends™ Wooden Toys litigation are such that oral argument will benefit the JPML in its deliberations and ultimate decision-making role. Further, as opposition from one or more Plaintiffs is possible, this Motion for Transfer is particularly appropriate for argument.

WHEREFORE, RC2 requests relief, pursuant to Rule 16.1, in the form of a hearing for oral argument set prior to the JPML consideration of and decision upon the requested transfer of the Thomas & Friends™ Wooden Toys litigation to a single forum for coordinated pre-trial proceedings.

Respectfully submitted,

RC2 Corporation and Learning Curve Brands, Inc.


By one of their attorneys

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